

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
JANUARY 2019 SESSION

JAN 18 2019

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA)	Criminal No. 7:19-CR- <i>00005</i>
)	
v.)	
)	SEALED INDICTMENT
)	
KEVIN DALE HOLLINS,)	<u>In Violation of:</u>
DAVID BRUCE GILLET,)	
PATRICK WILLIAM WRIGHT,)	21 U.S.C. § 846
DANIEL JAMES MYERS,)	21 U.S.C. § 841(a)(1)
MICHAEL LAWRENCE WALTERS, and)	18 U.S.C. § 924(c)
REBECCA JONES RICHARD)	18 U.S.C. § 922(g)(1)
)	18 U.S.C. § 2

COUNT ONE

The Grand Jury charges:

1. Beginning not later than March 21, 2017, and continuing until on or about September 15, 2018, in the Western Judicial District of Virginia and elsewhere, the defendants, KEVIN DALE HOLLINS, DAVID BRUCE GILLET, PATRICK WILLIAM WRIGHT, DANIEL JAMES MYERS, MICHAEL LAWRENCE WALTERS, and REBECCA JONES RICHARD did knowingly and intentionally combine, conspire, confederate and agree with persons known and unknown to the Grand Jury, to possess with intent to distribute and to distribute, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).
2. All in violation of Title 21, United States Code, Section 846.

COUNT TWO

The Grand Jury further charges:

1. That on or about November 14, 2017, in the Western Judicial District of Virginia, the defendant, KEVIN DALE HOLLINS, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

The Grand Jury further charges:

1. That on or about November 20, 2017, in the Western Judicial District of Virginia, the defendant, KEVIN DALE HOLLINS, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOUR

The Grand Jury further charges:

1. That on or about November 27, 2017, in the Western Judicial District of Virginia, the defendant, KEVIN DALE HOLLINS, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a

detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FIVE

The Grand Jury further charges:

1. That on or about April 12, 2018, in the Western Judicial District of Virginia, the defendant, MICHAEL LAWRENCE WALTERS, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SIX

The Grand Jury further charges:

1. That on or about April 19, 2018, in the Western Judicial District of Virginia, the defendants, MICHAEL LAWRENCE WALTERS and REBECCA JONES RICHARD, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet in the same.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

The Grand Jury further charges:

1. That on or about April 19, 2018, in the Western Judicial District of Virginia, the defendants, MICHAEL LAWRENCE WALTERS and REBECCA JONES RICHARD, knowingly possessed a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as set forth in Count Six of this Indictment, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT EIGHT

The Grand Jury further charges:

1. That on or about April 25, 2018, in the Western Judicial District of Virginia, the defendant, REBECCA JONES RICHARD, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT NINE

The Grand Jury further charges:

1. That on or about April 27, 2018, in the Western Judicial District of Virginia, the defendant, MICHAEL LAWRENCE WALTERS, did knowingly and intentionally possess with the intent to distribute a measurable quantity of a mixture and substance

containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TEN

The Grand Jury further charges:

1. That on or about April 27, 2018, in the Western Judicial District of Virginia, the defendant, MICHAEL LAWRENCE WALTERS, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Count Nine of this Indictment.
2. All in violation of Title 18, United States Code, Section 924(c).

COUNT ELEVEN

The Grand Jury further charges:

1. On or about April 27, 2018, in the Western Judicial District of Virginia, the defendant, MICHAEL LAWRENCE WALTERS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit an F.I.E. model T18 .22 caliber pistol, which had previously been shipped and transported in interstate or foreign commerce.
2. All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE

The Grand Jury further charges:

1. That on or about May 26, 2018, in the Western Judicial District of Virginia,

the defendant, REBECCA JONES RICHARD, did knowingly and intentionally possess with the intent to distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THIRTEEN

The Grand Jury further charges:

1. That on or about May 26, 2018, in the Western Judicial District of Virginia, at a time and place different from that set out in Count Twelve, the defendant, REBECCA JONES RICHARD, did knowingly and intentionally possess with the intent to distribute a measurable quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOURTEEN

The Grand Jury further charges:

1. That on or about May 26, 2018, in the Western Judicial District of Virginia, the defendant, REBECCA JONES RICHARD, knowingly possessed a firearm, to wit an RG Industries model RG23 .22 caliber revolver, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, as set forth in Count Thirteen of this Indictment.

2. All in violation of Title 18, United States Code, Section 924(c).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendants shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
- c. any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
- d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. **Money Judgment**

An undetermined sum of United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

b. **Firearms**

- i. An F.I.E. model T18 .22 caliber revolver, serial #4281
- ii. An RG Industries model RG23 .22 caliber revolver serial #T682327
- iii. A SCCY Industries model CPX-2 9mm pistol, serial #113999
- iv. All associated magazines and ammunition


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL this 18th day of January, 2019.

s/Grand Jury Foreperson
FOREPERSON



THOMAS T. CULLEN
UNITED STATES ATTORNEY